

RECEIVED

JUN 17 1993

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of:

Amendment of Part 22 of the  
Commission's Rules Pertaining  
to Power Limits for Paging  
Stations Operating in the 931  
MHz Band in the Public Land  
Mobile Service

CC Docket No. 93-116

**COMMENTS OF TELOCATOR, THE PERSONAL  
COMMUNICATIONS INDUSTRY ASSOCIATION**

Telocator, the Personal Communications Industry Association, herewith submits its comments in the above-captioned rulemaking to eliminate unnecessary restrictions on the use of high power facilities in the 931-932 MHz band.<sup>1</sup> Specifically, Telocator supports the Commission's proposal to allow the use of transmitter effective radiated power ("ERP") levels of up to 3500 watts regardless of whether the licensee has constructed additional co-channel facilities in the immediate vicinity. This action broadens the range of technical service arrangements available to licensees in the 931-932 MHz band, expanding their flexibility to meet the needs of the public in the most cost-effective manner possible. Accordingly, as discussed below, Telocator urges the Commission to expeditiously adopt the proposed changes.

<sup>1</sup> Amendment of Part 22 of the Commission's Rules Pertaining to Power Limits for Paging Stations Operating in the 931 MHz Band in the Public Land Mobile Service, CC Docket No. 93-116 (Apr. 23, 1993) ["Notice"].

**ALL 931 MHz PAGING LICENSEES SHOULD BE PERMITTED  
TO UTILIZE UP TO A MAXIMUM OF 3500 WATTS ERP**

Under the Commission's current rules, 931 MHz paging licensees are permitted to operate at up to a maximum ERP of 3500 watts. Nationwide network operators are permitted to utilize up to 3500 watts for any transmitter. Non-nationwide operators, in contrast, are generally restricted to 1000 watts or less, and only permitted to use higher power transmitters for internal coverage where the interference area created by the high power transmitter lies entirely within the licensee's existing contours.

The Notice now proposes to allow all operators to utilize up to a maximum ERP of 3500 watts, regardless of whether the operator is a national network operator or has existing co-channel facilities in the vicinity. Under the proposal, a non-nationwide network paging carrier would now be permitted to request authorization for a transmitter with an ERP greater than 1000 watts, but less than 3500 watts to extend service to new areas. Licensees' ability to use higher power transmitters, of course, would be limited by the potential for interference to other co-channel stations.

Telocator supports the proposal because it will beneficially increase licensees' flexibility to determine what technical arrangements bring the most economical and efficient service to the public. By offering licensees the ability to use high power facilities without having first

covered the area with lower power transmitters, the Notice's proposal offers solutions for real world engineering situations where wide area coverage is desired but multiple sites are uneconomic, where zoning or land use restrictions limit the ability to use multiple sites, where multiple sites are simply unnecessary, and where building penetration and man-made noise require special considerations.<sup>2</sup> As the Commission recognizes, expanded technical flexibility offers concomitant "efficiencies of scale, reduction in costs, and resulting benefits for consumers."<sup>3</sup>

In addition, allowing all 931 MHz band licensees to utilize up to a maximum authorized ERP of 3500 watts conforms the 931-932 MHz band rules with the rules for national network systems and the proposed rules for Narrowband Personal Communications Services. The Part 22 rules have, for several years, permitted national network systems operating in this same band to use a maximum authorized ERP of 3500 watts without any restriction, and, in fact, the minimum geographic separations table for 3500 watt transmitters already exist in the rules. Similarly, the proposed rules for next generation messaging services in the adjacent 930-931 MHz band contemplate allowing licensees to utilize maximum authorized ERP limits of 3500 watts.'

---

<sup>2</sup> Notice, ¶4.

<sup>3</sup> Notice, ¶6.

Telocator believes that it is both simple and appropriate to extend to all paging operators in the 931-932 MHz band the same flexibility to deploy the most technically efficient service arrangements possible. By removing restrictions that artificially limit sites to less than full power operation, the Commission will encourage rapid and cost-effective expansion of coverage in the 931-932 MHz band. For these reasons, Telocator urges the Commission to expeditiously adopt the proposed rule changes.

Respectfully submitted,

**TELOCATOR, THE PERSONAL  
COMMUNICATIONS INDUSTRY  
ASSOCIATION**

By: Thomas A. Stroup  
Thomas A. Stroup  
Mark Golden  
TELOCATOR, THE PERSONAL  
COMMUNICATIONS INDUSTRY  
ASSOCIATION  
1019 19th Street, N.W.  
Suite 1100  
Washington, D.C. 20036  
(202) 467-4770

June 17, 1993